

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Wireless E911 Location Accuracy Requirements)	PS Docket No. 07-114
)	
Revision of the Commission's Rules to Ensure)	CC Docket No. 94-102
Compatibility with Enhanced 911 Emergency)	
Calling Systems)	
)	
Association of Public-Safety Communications)	
Officials-International, Inc. Request for)	
Declaratory Ruling)	
)	
911 Requirements for IP-Enabled Service Providers)	WC Docket NO. 05-196
)	

COMMENTS OF THE CITY OF WICHITA FALLS, TEXAS POLICE DEPARTMENT

I. INTRODUCTION

The City of Wichita Falls, Texas Police Department provides these initial comments regarding the above captioned matters addressed in the Notice of Proposed Rulemaking, FCC 07-108, adopted by the Commission on May 31, 2007.

II. SUMMARY OF COMMENTS

Improving the accuracy and reliability of wireless E911 calls is paramount in the public safety arena. Wireless carriers must comply with the accuracy and reliability requirements of Section 20.18(h) of the Commission's rules at the PSAP service area level, not at a larger geographical area. As technology evolves, wireless carriers are able to provide the level of accuracy and reliability as outlined.

Deferring enforcement for an extended period does an injustice to PSAP's, but more importantly, does injustice to the public. As more and more calls into PSAP's are wireless, the public's expectation is that PSAP's know where they are.

III. DISCUSSION

A. Measuring and Testing Location Accuracy

The largest geographical area that should be tested for accuracy and reliability of ALI information is at the PSAP Service Area level. Topography dictates that any areas larger than the PSAP Service Area could greatly reduce the required percentage of accuracy as outlined in Section 20.18(h) of the Commission's rules. As every wireless user has experienced, there are "dead spots" where reception is not received by the user. Usually these "dead spots" are in rural areas where there are fewer cell towers. Emergencies occur in rural as well as metropolitan areas. By allowing wireless carriers to measure location accuracy at the state or, worse yet, multi-state coverage area, are we not sending a message to those families desiring to live in the country that "your life and safety isn't as important as the financial status of a wireless carrier?" Because, let's face it, that's what this is coming down to - money.

B. Defer Enforcement of Section 20.18(h) – Commission's rules

Deferring enforcement of this section should be limited to 12 months or less. The limited deferment affords wireless carriers time to map each PSAP Service Area and complete testing to meet the requirements as outlined.

IV. CONCLUSION

Wireless carriers have become very competitive to gain customers and meet the needs of their customers. They offer roll-over minutes, shared phone plans, and buy one phone - get five free, to name a few. But what about they're customers' safety? Personally, if I had a choice between roll-over minutes or a greater expectation that when I needed emergency assistance, I could depend on my location being transmitted to a PSAP with a high degree of accuracy, I'd go with the latter every time!

On several occasions, our PSAP has received 911 calls from the City of Fort Worth, located over 115 miles away, a location that is within the wireless carrier's coverage area. Sure, we get the ALI information, but is the intent of Section 20.18(h) being met? Look at the delay in response time.

Deferring enforcement of Section 20.18(h) needs to be limited to 12 months or less. Wireless carriers already have the capability of measuring and testing accuracy, they only need time to condense the testing areas to the PSAP Service Area level.

To meet the needs of the public's safety, I strongly encourage the Commission to require compliance at the PSAP Service Area level and to allow deferment of enforcement for the limited time as discussed.

Respectfully Submitted,

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